

UNITED STATES DISTRICT BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

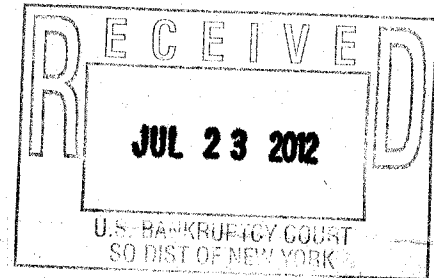
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Residential Capital, LLC, et al  
Debtor

Civil Case# 12 - cv 12020

v.

**U.S. Trustee -United States Trustee**  
33 Whitehall Street  
21st Floor  
New York, NY 10004  
(212) 510-0500



**Claims and Noticing Agent**  
**Kurtzman Carson Consultants**  
2335 Alaska Ave  
El Segundo, CA 90245

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**Motion for Leave to file Motion Pursuant Stay & Relief  
Oral Argument & Hearing Requested**

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Taggart has two claims against Debtor, GMAC Mortgage, LLC, pending in Federal Court regarding, *inter alia*, Fraud in the foreclosure process (case cv -12-4077)

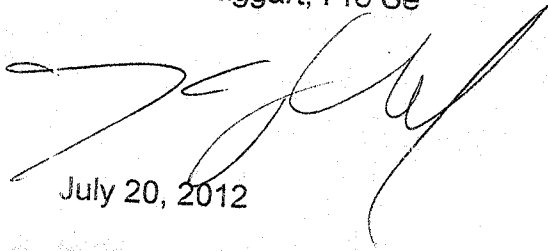
Taggart also has claims against Montgomery County Pennsylvania, with GMAC Mortgage LLC as a third party defendant filed in Federal Court (cv-12-0415). Taggart seeks Relief from Stay as both claims affect Taggart's foreclosure case that is currently pending The Court of Common Pleas, in Montgomery County, Pennsylvania.

(No: 09-25338)

Taggart had a hearing with the court on July, 10, 2012 in which the Honorable Judge Glenn ordered a continuance in which a brief and reply brief were ordered. There is a continuance scheduled for August 14, 2012.

Taggart requests a hearing with oral argument for the two cases pending in Federal Court on the same date of August 14, 2012 if at all possible or the soonest date it may be scheduled.

Kenneth Taggart, Pro Se



July 20, 2012

Kenneth Taggart  
45 Wren Rd  
Holland Pa 18946

Certificate of Service

**Case # Civil Case# 12 – cv 12020**

**Residential Mortgage Capital, et al**

The undersigned certifies that on July 20, 2012, he caused a copy of

**Motion for Relief from Stay in 2 Federal Cases in The Eastern  
District of Pennsylvania-(case cv -12-4077) & (case cv-12-0415).**

to be delivered to The United States bankruptcy Court for The Southern District  
of New York via United States Post Office. Additionally, the undersigned certifies  
that he caused a true and correct copy of the foregoing Notice to be sent via to  
United States Post Office on July 20 2012 to the following parties :

Counsel for Debtors

Morrison & Foster, LLP, Larren M Nashelsky, Gary Lee, Lorenzo Marinuzzi  
1290 Avenue of the Americas  
New York, NY. 10104

Office of the United States Trustee for the Southern District of New York  
33 Whitehall St, 21<sup>st</sup> Floor, Tracy Hope Davis, Linda Riffkin, Brian S Masumoto  
New York, NY. 10104

Counsel for Ally Financial

Kirkland & Ellis, LLP, Richard Ceieri, Ray Schrock, Stephan Hessler  
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New York, NY. 10022

Counsel for Administrative Agent for Debtors,  
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Kenneth Ziman and Johnathan Hofer  
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New York, NY. 10036

Counsel for United States of America, Ginnie Mae, US Dept of Justice,  
Glenn Gillett  
1100 "L" St NW, Room 10018  
Washington, D.C. 20005

U.S Attorney for Southern District of New York  
Joseph Cordero – Civil Division  
86 Chambers St, 3<sup>rd</sup> Floor  
New York, NY. 10007.

Certificate of service

Case # Civil Case# 12 – cv 12020

Residential Mortgage Capital, et al

Counsel for Fannie Mae  
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New York, NY. 10166

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Kenneth J Taggart  
Pro se

July 20, 2012

